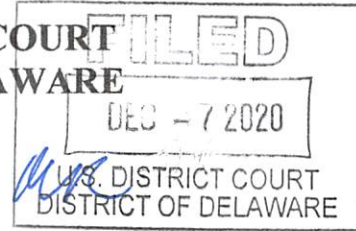


IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE



JOHN R. PURNELL III,  
PLAINTIFF,

V.

DELAWARE DEPT. OF INSURANCE,  
KAREN WELDIN-STEWART,  
NOEL EASON PRIMOS,  
WILCOX & FETZER LTD.,  
LEXITAS, NEXT GEN,  
JESSICA WILLEY,  
ROBIN DAVID, NICOLE HOLECEK,  
FRANK PYLE, and BANKERS  
INSURANCE COMPANY.  
DEFENDANTS.

CASE NO. 1:20-cv-01058-RGA

**MOTION FOR ENTRY OF DEFAULT**

NOW COMES THE PLAINTIFF, JOHN R. PURNELL III, *IN PRO*  
*PER*, who moves this Honorable Court with his MOTION FOR ENTRY OF  
DEFAULT, pursuant to **Federal Rule of Civil Procedure 55(a)**. In support  
thereof, he offers the following:

1. Plaintiff John R. Purnell III the complaint in this action on August 11,  
2020.
2. All parties were served pursuant to **Fed. Civ. R. Proced. 4**, and on  
October 28, 2020 the summonses were returned to this Honorable Court executed.
3. On Sept. 21, 2020 defendant Bankers Insurance Company filed its'  
Motion to Dismiss.

4. Defendants DELAWARE DEPT. OF INSURANCE, KAREN WELDIN-STEWART, NOEL EASON PRIMOS, WILCOX & FETZER LTD., LEXITAS, NEXT GEN, JESSICA WILLEY, ROBIN DAVID, NICOLE HOLECEK, and FRANK PYLE have all failed to plead, answer, or otherwise defend against the complaint.

5. **Fed. Civ. R. Proced. 55(a)** mandates that: *“When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default.”*

6. **Fed. Civ. R. Proced. 12(a)(1)(A)(i)** states that *“a defendant must answer within 21 days after being served with the summons and complaint.”*

7. As of November 18, 2020 the aforesaid defendants’ time to answer has elapsed. To date, the defendants have exceeded the time-bar by two weeks.

8. Because the named defendants have failed to plead, answer, or otherwise defend as required by court rules, the plaintiff humbly requests that the Clerk order an Entry of Default against them.

**WHEREFORE**, the plaintiff prays that the Clerk of Court issues the requisite Entry of Judgment against the aforesaid defendants.

Respectfully Submitted,

*John R. Purnell III*

**John R. Purnell III**

**Plaintiff – Pro Se**

**P.O. Box 1456**

**Bear, DE 19701**

**(302) 401-8051**

**IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE**

**JOHN R. PURNELL III,  
PLAINTIFF,**

V.

**CASE NO. 1:20-cv-01058-RGA**

DELAWARE DEPT. OF INSURANCE,  
KAREN WELDIN-STEWART,  
NOEL EASON PRIMOS,  
WILCOX & FETZER LTD.,  
~~LEXITAS, NEXT GEN,~~  
JESSICA WILLEY,  
ROBIN DAVID, NICOLE HOLECEK,  
FRANK PYLE, and BANKERS  
INSURANCE COMPANY.  
DEFENDANTS.

## ENTRY OF DEFAULT

**AND NOW TO WIT THIS**\_\_DAY OF\_\_\_\_\_,**2020,** the parties

having failed to plead or otherwise defend against the Complaint, it is an ENTRY OF DEFAULT is entered against: (1) DELAWARE DEPT. OF INSURANCE, (2) KAREN WELDIN-STEWART, (3) NOEL EASON PRIMOS, (4) WILCOX & FETZER LTD., (5) LEXITAS, NEXT GEN, (6) JESSICA WILLEY, (7) ROBIN DAVID, (8) NICOLE HOLECEK, and (9) FRANK PYLE.

## Clerk of Court

JOHN R. PURNELL  
P.O. BOX 1456  
BEAR, DE 19701

2100 0258310851

03 DEC 2020 PM 2 T



FOREVER / USA

U.S. DISTRICT COURT  
C/O CLERK OF COURT  
844 N. KING STREET  
WILMINGTON, DE 19801

